

Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Attn: Ms. Marlene H. Dortch, Secretary, FCC
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FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2011

Date filed: Thursday, February 23rd, 2012

Name of company covered by this certification: Voice Runner, Inc.

Form 499 Filer ID: 826001

Name of signatory: Garrett Ashmore


Title of signatory: Chief Financial Officer

I, Garrett Ashmore, certify that I am an officer of the company named above, and acting as an agent of the company, that to the best of my knowledge and having also relied upon information from other employees of the company, the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: 
Garrett Ashmore, CFO
Voice Runner, Inc.

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Description of CPNI Policies and Procedures

Voice Runner, Inc. is a small local, voice over IP telephone company, primarily serving the Houston suburban area of Katy, TX and a limited number of small-medium end user businesses located throughout Southeast Texas. With regard to this relatively small customer base, Voice Runner has knowledge of end user CPNI only insofar as it has information that it uses to bill its customers. Nevertheless, protecting even this limited end user CPNI is important to Voice Runner and the company has adopted various operational procedures to assure that, consistent with the Commission's rules, the CPNI that it holds is protected from unauthorized or illegal use, access and disclosure. In light of recent media information, Voice Runner is also reviewing those procedures and is currently implementing a plan to ensure the education & training of all of its employees regarding CPNI.

Our bookkeeper, Ms. Carol Owen, currently maintains the security of CPNI. The company has security measures in place to protect data from external attacks to its website and improper verbal requests for data via personal contacts with Voice Runner's customer care and billing departments. Voice Runner currently does not have a customer web portal and therefore does not allow customers to view traffic data on-line. If/when Voice Runner implements an updated website and a customer web portal, it is anticipated that the web portal will have login/password security and will use encryption to ensure the security of this information. It is anticipated that the web portal would limit customers to accessing their specific data only.

The company has procedures in place that allow only customers of record to obtain specific call detail information. Voice Runner does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties. Currently, Voice Runner has a relatively small sales force that is primarily focused selling its product through face to face meetings, and not primarily through any large-scale sales and marketing campaigns using CPNI. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is prohibited by the company as set forth in Voice Runner's updated employee handbook of policies & procedures.

All company employees are required to abide by the company's employee handbook, which requires employees to maintain the confidentiality of all information, including confidential customer information. The company's employees have been trained in the proper use of CPNI, and the company will enforce strict disciplinary measures for employees that misuse or mishandle CPNI.